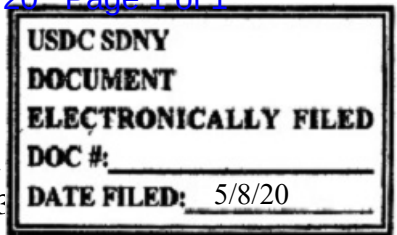


## TROY LAW, PLLC

ATTORNEYS / COUNSELORS AT LAW

Tel: 718 762 1324 [johnstroy@troypllc.com](mailto:johnstroy@troypllc.com) Fax: 718 762

41-25 Kissena Blvd., Suite 103, Flushing, New York 113



May 07, 2020

### VIA ECF

Hon. Barbara Moses, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

# MEMO ENDORSED

**Re: Plaintiffs Request One Week Extension to File Supplemental Letter**  
18-cv-07342- JKG *Rodolfo Tecocoatzzi-Ortiz, et al v. Just Salad LLC. et al.*

Your Honor,

This office represents Plaintiffs' in the above referenced matter. We write respectfully to request an extension of time until May 14, 2020 to file a supplemental letter containing the information required by Section 2(b) of the Your Honor's Individual Practices along with a copy of the first set of interrogatories and first demand for document production and defendant's response.

On April 30, 2020 this undersigned office wrote to Your Honor that we will file the supplemental letter after Defendants provide use with our Discovery Request and Your Honor has ordered to file the letter by May 7, 2020.

On May 4, 2020 Defendants have provided us with Defendant's response to Plaintiff's First Set of Interrogatories and Plaintiff's First Set of Document Demands. But due to voluminous records of documents the undersigned office did not have sufficient time to review the document and as such they could not confer with the Defendants.

For this foregoing reasons Plaintiffs respectfully request to extend time until May 14, 2020 file a supplement letter pursuant to the Your Honor's Individual Practices and Order.

We thank the Court for its time and consideration in this matter.

In light of defendants' production of written discovery demands and "voluminous records of documents," it is not clear what, if any, live discovery dispute(s) remain between the parties. Therefore, the discovery conference scheduled for May 13, 2020, at 10:00 a.m. is ADJOURNED *sine die*. The parties may raise further discovery disputes by following the procedures set forth in Local Civil Rule 37.2 and this Court's Individual Practices. *See* Moses Indiv. Prac. §§ 1(b)-(d), 2(b). SO ORDERED.

Barbara Moses, U.S.M.J.  
May 8, 2020

Respectfully Submitted,  
TROY LAW, PLLC  
*Attorneys for Plaintiffs*

/s/ John Troy  
John Troy